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POLREP #1

MURD INVESTIGATION (CARE LABS)
2314 N. AMERICAN ST.
PHILADELPHIA, PHILA. COUNTY, PA
ATTN: GREGG CRYSTALL AND TIM FIELDS
I. SITUATION (1700 HOURS, APRIL 8, 1991)

- A. THE PFD HAZ-MAT ADMINISTRATIVE UNIT (PFD HMAU) REQUESTED EPA'S ASSISTANCE AT AN INVESTIGATION OF THE CARE LABS FACILITY LOCATED AT THE ABOVE ADDRESS. CARE LABS HAS REPLACED MURD CO. AT THIS LOCATION. THE REQUEST OF THE FIRE DEPT. WAS BASED ON THE SUSPICION THAT PRODUCT MATERIAL WHICH WAS TRANSFERRED FROM THE E-Z CHEMICAL EPA SUPERFUND SITE BY THE OWNER OF THE E-Z CHEMICAL FACILITY TO MURD CO. FOR STORAGE WAS STILL CONTAINED AT THE CARE LABS FACILITY.
- B. ON MONDAY, APRIL 1, 1991, OSC ENGLISH, OSC POWELL, AND TAT MET WITH THE PFD TO DISCUSS THESE CONCERNS. SINCE THE CARE LABS FACILITY IS NO LONGER OWNED BY MURD, THE PFD IS CONCERNED THAT THE MATERIAL OWNED BY E-Z CHEMICAL MAY NOW BE ABANDONED AT THE CARE LABS FACILITY. DUE TO THE DANGEROUS NATURE OF THESE MATERIALS, THE PFD EXPRESSED THEIR CONCERN THAT AN IMMINENT THREAT TO PUBLIC HEALTH AND/OR THE ENVIRONMENT MAY BE POSED BY THIS STORAGE.
- C. THE PRP OF E-Z CHEMICAL, MR. E. ZAKROCKI, SIGNED AN AGREEMENT WITH EPA AGREEING TO PROPERLY SELL OR DISPOSE OF THE MATERIALS HE REMOVED. AN ABANDONMENT OF THIS PRODUCT WOULD VIOLATE THE CONSENT ORDER.
- D. CARE LABS WAS ISSUED A CEASE AND DESIST ORDER ON 1/28/91. HOWEVER, THESE ORDER HAS SINCE BEEN LIFTED BY THE CITY'S DEPT. OF LICENSE AND INSPECTION (L&I).
- E. EPA AGREED TO ASSIST THE PFD ON AN INVESTIGATION OF THE FACILITY ON 4/8/91.

II. ACTIONS TAKEN

- A. EPA REPRESENTATIVES POWELL, ENGLISH, THOMAS, AND RICHARDSON, AND TAT MET WITH PFD-HMAU LT.HOWARD AT 0900 HOURS TO ASSIST WITH THE FIRE DEPT.'S INSPECTION. THE OUTSIDE OF THE FACILITY WAS NOT MARKED OR IDENTIFIED IN ANY WAY WITH THE FACILITY'S NAME OR TYPE OF BUSINESS. THE FACILITY WAS LOCKED. AN ADJACENT YARD WAS SURROUNDED WITH A FENCE.

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- B. ACCESS TO THE FACILITY WAS GIVEN BY A CARE LABS EMPLOYEE, MR. MC FLEMING. OSC THOMAS ASKED MR. MC FLEMING IF ANY MATERIALS OWNED BY MR. E. ZAKROCKI (PRP, E-Z CHEMICAL) HAD ANY PRODUCTS STORED AT THE WAREHOUSE. MR. MC FLEMING REPORTED THAT THERE WERE MATERIALS BELONGING TO MR. ZAKROCKI AT THE FACILITY AND PROVIDED OSC THOMAS WITH AN INVENTORY. THESE MATERIALS INCLUDED OXIDIZERS (CALCIUM HYPOCHLORITE), CORROSIVES (SULFURIC ACID, HYDROFLUORIC ACID), AND FLAMMABLES (OCTANE BOOSTER).
- C. EPA AND TAT PERFORMED AN ASSESSMENT OF THE WAREHOUSE. TAT RECOGNIZED MANY OF THE MATERIALS AS ORIGINATING FROM THE E-Z CHEMICAL SITE, AS THEY BORE SITE IDENTIFICATION NUMBERS. TAT ALSO RECOGNIZED SEVERAL DRUMS AS BELONGING TO OTHER MANUFACTURERS WHICH WERE STORED AT THE SITE.
- D. THE FACILITY REP. INFORMED EPA REPRESENTATIVES THAT CARE LABS HAD SECURED AN ENVIRONMENTAL CONTRACTOR TO SEGREGATE MATERIALS IN THE WAREHOUSE. EVIDENCE OF THIS ACTIVITY WAS OBSERVED, AS MANY OF THE DRUMS HAD CONTRACTOR IDENTIFICATION NUMBERS.
- E. MANY OF THE DRUMS WERE IN POOR CONDITION AND STORED IN AN UNSAFE MANNER. DRUMS WERE STACKED DIRECTLY ON TOP OF ONE ANOTHER, WITHOUT PALLETS OR OTHER MEANS TO SAFELY SEPARATE OR MOVE THEM. FIBERBOARD BOXES WERE STORED DIRECTLY ON TOP OF DRUMS CONTAINING OXIDIZERS. SOME DRUMS HAD OPEN BUNGS. SOME DRUMS HAD TOPS COVERED WITH WASTE/PRODUCT.
- F. SEVERAL PUDDLES OF LIQUID WERE OBSERVED ON THE WAREHOUSE FLOOR. THESE MATERIALS WERE TESTED WITH PH PAPER AND DETERMINED TO BE NEUTRAL.
- G. THE FACILITY REP. STATED THAT THE DRUMS BELONGING TO E-Z CHEMICAL HAVE NOT BEEN DISTURBED BY CARE LABS.
- H. THE CONDITION OF THE WAREHOUSE WAS PHOTODOCUMENTED BY TAT.

III. FUTURE PLANS

- A. EPA REPRESENTATIVES TO MEET WITH THE OWNER OF THE CARE LABS FACILITY ON 4/9/91.

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